

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

MDL No. 2262  
Master File No. 1:11-md-2262-NRB

**ORAL ARGUMENT  
REQUESTED**

THE CHARLES SCHWAB CORPORATION, et al.,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, et al.,

Defendants.

No. 13-cv-7005-NRB

FEDERAL DEPOSIT INSURANCE  
CORPORATION AS RECEIVER FOR DORAL  
BANK,

Plaintiff,

v.

BANK OF AMERICA, N.A., et al.,

Defendants.

No. 18-cv-1540-NRB

**NOTICE OF DEFENDANTS' JOINT MOTION TO DISMISS THE  
SCHWAB AND DORAL COMPLAINTS FOR FAILURE TO STATE A CLAIM  
AND LACK OF PERSONAL JURISDICTION AND VENUE**

PLEASE TAKE NOTICE that the undersigned attorneys for Defendants Bank of America Corporation, Bank of America, N.A., The Bank of Tokyo-Mitsubishi UFJ, Ltd. (n/k/a MUFG Bank, Ltd.), Barclays Bank PLC, British Bankers' Association, BBA Enterprises Ltd., BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.), Citigroup Inc., Citibank, N.A., Credit Suisse AG, Credit Suisse Group AG, Credit Suisse International, Coöperatieve Rabobank U.A. (f/k/a Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.), Deutsche Bank AG, HSBC Holdings plc, HSBC Bank plc, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., Lloyds Banking Group plc, Lloyds Bank plc (f/k/a Lloyds TSB Bank plc), HBOS plc, Bank of Scotland plc, The Norinchukin Bank, Portigon AG (f/k/a WestLB AG), Westdeutsche ImmobilienBank AG, Royal Bank of Canada, The Royal Bank of Scotland Group plc, The Royal Bank of Scotland plc, Société Générale, and UBS AG, in the above-referenced matter, will move this Court, before the Honorable Naomi Reice Buchwald, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(2), (3) and (6) of the Federal Rules of Civil Procedure dismissing with prejudice the claims asserted in each of the above-captioned actions in which they are defendants.<sup>1</sup>

The grounds for this motion are set forth in two memoranda: (1) the Joint Memorandum Of Law In Support Of Defendants' Motion To Dismiss For Lack Of Personal Jurisdiction And Venue And In Opposition To Plaintiffs' Motions For Leave To Amend On Personal Jurisdiction

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<sup>1</sup> The Defendants moving on personal jurisdiction and venue grounds are identified in Appendices 1 and 4 respectively to the Joint Memorandum Of Law In Support Of Defendants' Motion To Dismiss For Lack Of Personal Jurisdiction And Venue And In Opposition To Plaintiffs' Motions For Leave To Amend On Personal Jurisdiction And Venue Grounds.

And Venue Grounds, and (2) the Joint Memorandum Of Law In Support Of Defendants' Motion For Partial Dismissal Of The *Schwab* And *Doral* Complaints For Failure To State A Claim.

PLEASE TAKE FURTHER NOTICE that movants request oral argument of this motion.

Dated: New York, New York  
July 13, 2018

Respectfully submitted,

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